

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EMAN SOUDANI,

Plaintiff and Counterclaim-Defendant,

-against-

MOUT'Z SOUDANI,

Defendant and Counterclaim-Plaintiff.

Case No.: 23-cv-9905 (PMH) (AEK)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Plaintiff and Counterclaim-Defendant Eman Soudani (“Plaintiff”), through her undersigned attorneys, respectfully moves this Court for clarification on the propriety of the confidential designation under the Stipulated Confidentiality Agreement and Protective Order (ECF No. 36, “Protective Order”), and seeks an Order declaring that the documents at issue are not “Confidential” under the Protective Order, and in the alternative, an Order authorizing limited disclosures of the documents as set out in the Memorandum of Law filed in support herewith, and for such other and further relief as the Court deems just and proper. In support, and filed herewith, Plaintiff submits her Memorandum of Law and the Declaration of Arthur D. Middlemiss, each dated June 13, 2024.

Dated: New York, New York  
June 13, 2024

/s/ Arthur D. Middlemiss  
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